Long Beach Water Department 10/2/2007

There's no question you have correctly identified a huge problem with the current system of water planning in California. ...not at all convinced that the IRWMP process is making it any better.

Gerald Greene 10/10/2007

I found the paper very commendable, however I wonder how we get single purpose regulators (water, air, traffic etc.) to move toward larger common goals.

Also government staff are chronically overworked (or under-motivated) so that it is challenging to shift them from the short to long term.

Although I try to think long term, it is rare that I can spend a week on a task, before other more pressing demands wash the priority from my mind.

These are not criticisms of the paper, but of our society.

IF we could better address them, the goals in this paper might become more achievable. Anyway, bottom line, good reading, if a little frustrating for a little guy in the trenches.

Jerry Gewe 10/12/2007

The paper is very well done and lays out the issues quite clearly. One point that might be added in the discussion at the top of page 2 is that the current guidelines for allocation of the bond funds recognize the importance of holistic benefits and give higher ratings to projects that include multiple benefits.

Notwithstanding your excellent presentation, I am afraid that I have a jaundiced view of the current political leadership in this state and do not see adoption for many years. When the political leadership cannot even integrate the handling of traffic on the 5 freeway between Orange and Los Angeles Counties (per my reading of the news), it seems unlikely that they will have the will to deal with the much more complex issues of resource policy. Unfortunately most of the current political leadership can only deal with the short term and feel the need to present themselves as solving problems in real time which provides them with constituent support. Solving problems before the electorate clamors for it, does not provide political points. For northern Californian's to solve Southern California's water supply problems does not gain political support for the leaders that might support it and likewise for southern Californians to participate in solving delta environmental problems does not make many political points locally. (See the San Diego newspapers take on the current water bond negotiations and their view of the money being proposed for the delta improvements without addressing convenience

issues.) Perhaps if the current drought persists for another five years the impacts may raise the level of perception of the problems to a level that your approach could become real, but short of that I am afraid you are engaging in an academic exercise.

My opinion is that while you should raise the issues you are raising and get the discussion going for the time when it is politically acceptable, you would find it more productive to focus on regional implementation in areas where there is an understood co-dependency. If you can get some success at the regional level and gain some ability to generate acceptance of the trade-offs that are involved in such integration ie. groundwater quality degradation at reasonable levels to gain greater supply dependability), you will have ammunition to use in focusing on the broader state-wide perspective.

Anonymous 10/17/2007

Very interesting concept. At a recent meeting of the Delta Vision task force, one of the members asked DWR whether the IRWMPs were coordinating with the blueprint plans. The rather awkward answer suggested that such coordination was happening. News to me...

I would suggest that the paper acknowledging that most forms of planning are limited to the boundaries of individual jurisdictions. Watershed plans, and more recently, TMDL plans have crossed jurisdictional boundaries, but deal with a very limited set of issues (as most local watershed plans really only deal with stormwater quality and open space with minor attempts to acknowledge connections to other issues). IRWMPs cross more boundaries, and attempt to bridge the various aspects of the hydrologic cycle, but the content of most plans varies based on local concerns, with little attempt to look at a larger context.

The Blueprint provides an opportunity to bridge various planning issues, providing the larger context most of these plans lack, and creates an opportunity for coordination of efforts, leveraging funding, and identifying regional solutions to which local plans can contribute.

For the LA IRWMP, as we move forward to the next plan update, I've been wondering how we can reflect the larger context. The CA Water Plan provides a larger context, but makes no attempt to identify any regional priorities. The blueprint may provide the relevant context for the LA plan, which could be combined with the larger discussion of statewide water issues.

West Basin Municipal Water District 11/14/2007

Question 1: How will the California Water Plan be incorporated into the proposed *Blueprint* Planning?

Comments: Currently, the Department of Water Resources prepares and updates (every five years) the California Water Plan to provide a framework for water managers, legislators and the public to consider options and make decisions regarding California's future. The Water Plan provides water resource information, including water supply evaluations and assessments, for policy makers and planning professionals to consider in developing future public policies. Would the *Blueprint* Plan usurp the Water Plan?

Question 2: Would the existence of a *Blueprint* Plan eliminate the need for Integrated Regional Water Management Plans?

Comments: It is mentioned in the Draft Policy Paper that the *Blueprint* planning will be on a regional basis; however, it fails to define "a region." The logical creation of regions, from the water industry's perspective, is to define the regions using either a hydrologically-based model or an IRWMP model, but these systems might not be appropriate in transportation and/or housing planning, as proposed in the SCAG's Draft Policy Paper. Our concern is that the funding will be allocated to mega-regions (or metropolitan areas) where population is dense and the needs appear to be greater; however, there are smaller regions that consist of suburbs and small municipal water agencies rather than metropolitan areas that would benefit equally from the bond funding.

Another question that I have is regarding accountability. If the *Blueprint* Plan provides specific targeted goals, who will be accountable for ensuring the achievement of these goals with the funding provided? Is this the responsibility of the State, SCAG, or local entities? For example, in the Greater Los Angeles County Region IRWMP, all of the stakeholders are responsible for ensuring that the targets outlined in the adopted Plan are met. The way to ensure this success is to implement projects in the Region that meet the adopted quantitative targets for water supply, water quality and habitat and open space. The Leadership Committee has made a commitment to ensure that the 20-year targets are met with the appropriate selection and implementation of projects with the bond funding awarded to the Region.

<u>Question 3</u>: Would a *Blueprint* Plan provide financial safeguards to water programs, projects and issues, while managing the available grant funds through an "objective prioritization process?"

Comments: As noted in the Draft Policy Paper, it is true that, "California's water future is now front and center in Sacramento," however, this is not always the case. While education, transportation and housing issues are regularly highlighted in the daily news and experience in most of our daily lives, the

public's interest and attention paid to California's water resources typically fluctuates with the current climate conditions.

Our concern is that if California experiences a wet winter and the snow pack in the Sierra Mountains is plentiful, the public's willingness to allocate funding on water resources will subside and the focus will be shifted to one of the other six areas. As a water wholesaler who depends on bond funding for conservation, recycled water and ocean water desalination research programs, any issue reprioritization during a wet winter may be detrimental to our service area if funding is no longer available for these programs.

<u>Question 4</u>: As identified in the "Recommendations" portion of the Draft Policy Paper, is it SCAG's recommendation that the "combined funding streams" include the recently, voter approved, bond proceeds (2006 Infrastructure Bond Package)?

Comments: In October 2006, the Legislative Analyst Office (LAO) produced a publication entitled, "Implementing the 2006 Bond Package," as a means to guide the implementation process of the \$42.7 billion infrastructure bond package. While the LAO did recommend the expansion of certain "streamlining" measures, their analysis did not waiver on the concept that the programs funded be in accordance with the Legislature's and voters' intent. For this reason, we would oppose the commingling of the voter approved bond proceeds if such funds would be used outside the scope of each respective bond.

City of LA - Watershed Protection Division (DPW, Bureau of Sanitation) 11/21/2007

The draft SCAG paper (Blueprint) is a comprehensive policy which creates an opportunity for more intensive discussion and better planning of future water and other resources; a future with climate change and growth. I support the Blueprint for the following reasons:

- 1. The policy considers population growth; not all of the regional water management/water quality planning includes future population growth. It is imperative that the Blueprint growth management principles now be integrated with regional resource planning and implementation.
- 2. The increase in automotive trips, greenhouse gases, and ultimately climate change will considerably affect water management planning. The results of climate change including decrease in inland precipitation and a shorter rain cycle in winter would lower the amount of water available to California.
- 3. Support a sustainable outcome: water management is one area where resource consumption, flood protection, growth, land use, and climate change all interact within a

comprehensive planning process, that seeks to produce environmentally sustainable outcome.

- 4. The policy supports stretching planning dollars further by integrating water resource planning in the larger regional planning framework (Blueprint).
- 5. This approach will bring forward the kinds of investments and actions including public and private in the form of creative projects with multiple benefits.
- 6. The policy is proposing to look at all the elements in a comprehensive long-term planning with environmentally sustainable outcomes as opposed to piecemeal efforts.
- 7. The water community of California will require State guidance and support (inform of regulations, policy, and grants) to integrate its planning efforts into this larger framework.

As always the challenge exist in bringing all the stakeholders (regulators, regulated and environmental communities, public, private) around the same table, but the benefits far exceeds the challenges.

Municipal Water District of Orange County 1/15/2008

Your draft policy paper "Water and California's Future: Getting Into the Bigger Picture of Growth, Resources, Sustainability" has made a splash in Orange County. Here at MWDOC, we are getting a number of inquiries from some of the water agencies and cities. Can you help me understand if this paper is for purposes of comments from interested parties, and if so, what is the due date for these comments? We would like to have a discussion about the ideas and suggestions in the paper with a variety of interested parties – including our member agencies within MWDOC, the Metropolitan member agencies, and of course our Board of Directors. However, it is not clear what the process or timeframe is for providing comments. A few agencies are under the impression that comments are required as early as this Thursday. Any clarification you can provide on the process and timeline for providing our comments on this draft policy paper would be much appreciated.

Rivers and Mountains Conservancy Director of Water Policy 1/16/2008

Note: "comments... are my own and do not represent an official position of the RMC or its Executive Officer..." – Dir. Water Policy, 1/16/08

Support for general concept

The *Blueprint* approach to fully integrated planning as outlined in the draft policy paper is a sweeping and ambitious proposal. In general, the goal of more extensive integration of planning efforts has much merit. The draft paper considers an expansion of planning integration both in subject matter (land use, air and water resources, housing, transportation, etc.) and in geographic scope. Ideally, more extensively integrated planning of this type should result in overall cost savings and better societal outcomes. Because these subject areas interact to positively or negatively affect outcomes – for example, by causing or avoiding sources of pollution or other negative impacts – they should be considered together. Thus, the *Blueprint* planning approach that incorporates water resources with all other relevant planning areas is desirable. And as the paper points out, this integration is difficult and rarely achieved.

Relate to other water planning approaches currently in use

While desirable in concept, the approach set out in the draft paper may create some confusion about how it would be different from – and an improvement over – other forms of integration currently in practice or under discussion relative to water resources. Throughout the state, public agencies and many stakeholders are engaged in Integrated Regional Water Management Plan development. Encouraged by Propositions 50 and 84, this initiative has expanded coordination with subject areas not traditionally involved in water resource planning. Not only storm water and flood management, water supply, and water quality, but also open space and watershed protection, and to some extent other land use issues are being integrated into this more comprehensive form of planning. The full results of IRWMP-style planning are not known yet, as this experiment is still in progress and evaluation would be somewhat premature.

The California Department of Water Resources has started work on its 2009 Water Plan, in which it intends to incorporate planning from the several IRWMP regions across the state. Exactly how, and how well, this will be achieved is uncertain. Also uncertain is whether, and how, its achievement will improve water resource planning at the state-wide level.

A third form of broader and more integrated planning is the movement throughout the state (and in other parts of the country as well) toward watershed-level planning. This effort is largely motivated by the desire to improve watersheds' natural function and prevent their further degradation. This effort has some traction but is still being organized state-wide. It is uncertain at this time to what extent urban planning issues will be incorporated in watershed planning, although every urban area is in fact located within one or more watershed.

Each of these efforts intends to be more broad and inclusive than more traditional water resource planning efforts, yet clearly none of them comes close to the inclusiveness proposed in the draft paper. Inasmuch as these efforts are currently under way, the paper would be strengthened by discussing how a *Blueprint* planning framework might relate to, and hopefully benefit from, them. Would new agreements formally involve leaders of these other efforts in a *Blueprint* process? A sound method to use and leverage the information and plans generated by these other efforts would increase the appeal of the *Blueprint* planning framework advocated in the paper. Additionally, it would help the

reader to define or provide an example of the "megaregion" in which this would be undertaken; is it the same as the SCAG region or different?

Further articulate and quantify advantages over traditional planning approaches

As presented in the draft paper, a *Blueprint* framework may have significant benefits to a region over separate and uncoordinated processes. By the same token, planning entails costs and the cost of planning on such a large scale might be very significant. From other experiences with *Blueprint* planning, the costs and benefits should be estimated for what is proposed in the paper. Some of the benefits (or avoided costs) might be from improved outcomes in land use, housing location, building design, social welfare, etc. Such benefits could be hard to quantify, but to the extent possible, should at least be illustrated by examples, a hypothetical scenario, or a short case study (just one or two paragraphs).

Another concern may stem from the perception or threat that project funds might be lost or subsumed. The paper might need to make a stronger argument for the value of cooperation over the competitive posture that would normally be taken. The nature of humans and organizations is to seek individual gains first, unless substantial incentives for cooperation are seen. The paper should possibly discuss a structural mechanism to channel the normal competitive instinct, or persuasively lay out the case for the value of cooperation to the individual organization (be it in the public, private, or non-profit sector).

A related concern that should be addressed is to ensure the accountability for voter-approved bond funds, and that such funds would ultimately be used for the intended purposes. This concern could arise from the melding of funds derived from housing, transportation, water, and park bonds in a comprehensive *Blueprint* approach. The paper should probably address this potential concern up front.

City of Anaheim – Public Utilities Department – Water Engineering 1/17/2008

Thank you for the opportunity to review and comment on SCAG's Water Policy Paper. Our understanding from the paper is that the Southern California Association of Governments' (SCAG) proposes that their organization identify and develop a holistic approach for comprehensive and integrated regional water resource planning. The key reason to do so is to provide California regions, and specifically the SCAG region, with the tools and resources for comprehensive and integrated planning to better guide regional and local development toward a more sustainable future than current development trends. This is an admirable goal.

The paper advocates and directs SCAG to pursue actions to expand the existing Blueprint Planning process currently used in transportation planning and policy into the water policy arena through the following recommended actions:

• Integration of infrastructure and resource management planning within a performance-based regional *Blueprint* planning framework;

- Dedication of state and federal funding to advance regional *Blueprint* and related local planning efforts that advance system-wide environmental sustainability; and
- Prioritization of state and federal funding for projects that coordinate with the comprehensive regional *Blueprint* and related local planning, and that are financially constrained, performance-based, and leverage local and private sector investments.

Although the concept presented in the paper is valuable for integrated water resource planning, it is not clear how the SCAG approach would be integrated with or replaces existing regional water planning efforts. It appears that this new effort may overlap with what is already being done by the Santa Ana Watershed Project Authority (SAWPA), specifically their recent One Water, One Watershed (OWOW) program. SAWPA has been conducting regional water planning for many years and they work at coordinating grant opportunities for regionally significant projects. We suggest that should SCAG decide to pursue this effort that they coordinate their efforts with SAWPA and other regional water planning organizations, such as the Metropolitan Water District of Southern California, and participate in the OWOW program to help promote planning and funding for the region's water resources projects. In addition, individual water agencies' Urban Water Management Plans should be utilized in this effort.

We also request that SCAG, before moving forward on this effort, hold outreach meetings with the water agencies to discuss what blueprint planning is and how SCAG intend to use it. This would help water agencies to have better understand of the Blueprint planning promoted by SCAG.

City of Brea 01/30/08

Brea has been an active supporter of SCAG's efforts to encourage regional planning and to develop regional solutions to cross-jurisdictional issues such as population growth, traffic, transit options, water supply and consumption, air quality, etc. In reviewing the Draft document there appears to be a strong emphasis on tying future funding for water infrastructure to SCAG's land use/population growth model established through the Compass Blueprint Project. The growth allocations and land planning of Compass Blueprint are part of an on-going planning efforts by SCAG. The use of this plan for evaluating and qualifying infrastructure projects could represent an unfair advantage to certain communities. While Brea has adopted a General Plan and associated zoning to promote higher density housing in appropriate areas, we also have significant portions of land dedicated to existing and planed lower density development. These areas will also benefit from water system improvements and should not be at a disadvantage when competing for future funding.

A funding program that considers and encourages higher density growth in appropriate locations is a meritorious idea; it should not be the dominant or sole criteria for the funding of water infrastructure projects.

Brea will make every effort to encourage water conserving practices in all development and look for opportunities to retro-fit older infrastructure as we make repairs or phase-in replacement equipment.